

From: Schwankl, Larry <schwankl@uckac.edu>
To: Davidoff, Baryohay
Cc: Alemi, Manucher
Sent: Fri Mar 25 10:58:22 2011
Subject: Comment on draft water measurement regulation

Baryohay,

Just a comment on the draft regulation and it may be already taken care of in discussions or in the wording of the regulation. If you feel it is, please disregard the issue.

There seemed have been some discussion in the Committee which I found somewhat ambiguous regarding how accuracy was measured. The issue was whether accuracy is measured at the individual measurement device level or on the aggregate district level.

Maybe a simple example would help. Two flow measurement devices are evaluated in a district. One is +30% accurate and the other is -35% accurate. Evaluated individually, they are both quite inaccurate and would certainly not meet the proposed regulation, but measured in the aggregate (averaged together) they would be -5% accurate and meet the regulation. I believe the issue is, does the current Regulation wording allow a provider to measure efficiency in the aggregate or can it only be measured on an individual flow measurement device basis?

Larry